

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

December 15 2021  
Ravi Subramanian, Clerk  
By Attorney Ravi Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JAMES WESLEY BOWDEN,  
Defendant.

NO. **CR21-219 RSM**  
INDICTMENT

The Grand Jury charges that:

**COUNT 1**

**(Unlawful Possession of Firearms)**

On or about November 4, 2021, in Snohomish County, within the Western District  
of Washington, JAMES WESLEY BOWDEN, knowing he had been convicted of the  
following crimes punishable by imprisonment for a term exceeding one year:

*Burglary in the First Degree*, in Skagit County Superior Court, Washington, under  
cause number 98-1-00435-1, on or about January 14, 1998, and

*Theft of a Firearm*, in Skagit County Superior Court, Washington, under cause  
number 98-1-00435-1, on or about January 14, 1998,

1 | did knowingly possess, in and affecting interstate and foreign commerce, the following  
2 | firearms:

3 | DPMS Inc. Model A-15 5.56mm rifle;  
4 | Savage Model 110 .270 Winchester caliber rifle;  
5 | Ceska Zbrojovka Model CZ 75 Tactical Sporter Orange .40 S&W caliber pistol;  
6 | Smith & Wesson Model M&P 15 .458 SOCOM caliber rifle;  
7 | Colt Model Single Action Army .45 Colt caliber revolver;  
8 | Colt Model Detective Special .38 Special caliber revolver;  
9 | Czech Small Arms Model SA VZ61 .32 ACP caliber pistol;  
10 | Izhevsk Mechanical Plant Model IZH 35 .22LR caliber pistol; and  
11 | International Die Casting (Jimenez Arms) Model JA 380 .380ACP pistol;

12 | all of which had been shipped and transported in interstate and foreign commerce.

13 | All in violation of Title 18, United States Code, Section 922(g)(1).

14 | **COUNT 2**

15 | **(Possession of Machineguns)**

16 | On or about November 4, 2021, in Snohomish County, within the Western District  
17 | of Washington, JAMES WESLEY BOWDEN knowingly possessed the following  
18 | machineguns: a .308 Winchester caliber machinegun assembled using a receiver from an  
19 | Imbel FZ Model FZ SA rifle, and a .300 Blackout caliber machinegun manufactured  
20 | using a receiver of unknown origin.

21 | All in violation of Title 18, United States Code, Sections 922(o).

22 | **COUNT 3**

23 | **(Possession of a Short Barreled Rifle)**

24 | On or about November 4, 2021, in Snohomish County, within the Western District  
25 | of Washington, JAMES WESLEY BOWDEN knowingly possessed a firearm, that is, a  
26 | 9x19mm caliber privately made rifle, having a barrel of less than 16 inches in length,  
27 | which was not registered to him in the National Firearms Registration and Transfer  
28 | Record.

1 All in violation of Title 26, United States Code Sections 5861(d) and 5845(a)(3).

2 **COUNT 4**

3 **(Possession of a Destructive Device)**

4 On or about November 4, 2021, in Snohomish County, within the Western District  
5 of Washington, JAMES WESLEY BOWDEN knowingly possessed a destructive device,  
6 that is, a grenade, which was not registered to him in the National Firearms Registration  
7 and Transfer Record.

8 All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8).

9 **COUNT 5**

10 **(Possession of Silencers)**

11 On or about November 4, 2021, in Snohomish County, within the Western District  
12 of Washington, JAMES WESLEY BOWDEN knowingly possessed firearm silencers,  
13 that is, two black cylindrical silencers with no identifying markings, which were not  
14 registered to him in the National Firearms Registration and Transfer Record.

15 All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(7).

16 **COUNT 6**

17 **(Improper Storage of Explosives)**

18 On or about November 4, 2021, in Snohomish County, within the Western District  
19 of Washington, JAMES WESLEY BOWDEN knowingly stored high explosives in a  
20 manner not in conformity with regulations promulgated by the Attorney General pursuant  
21 to Title 18, United States Code, Section 847, in that he stored high explosives, including  
22 triacetone triperoxide (TATP) and picric acid, in a detached workshop in close proximity  
23 to his residence, said workshop not then conforming with the requirements of Type 1  
24 storage facilities.

25 All in violation of Title 18, United States Code, Sections 842(j) and 844(b), and  
26 Title 27, Code of Federal Regulations, Section 555.201, *et. seq.*

**FORFEITURE ALLEGATION**

The allegations contained in Counts 1 – 6 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, JAMES WESLEY BOWDEN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and associated ammunition that were involved in the offense. These include but are not limited to:

- a. one DPMS Inc. Model A-15 5.56mm rifle, bearing serial number FH28458, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
- b. one Savage Model 110 .270 Winchester caliber rifle bearing serial number F255255, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
- c. one Ceska Zbrojovka (CZ) Model CZ 75 Tactical Sporter Orange .40 S&W caliber pistol bearing serial number D225312, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
- d. one Smith & Wesson Model M&P 15 .458 SOCOM caliber rifle bearing serial number SZ56510, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
- e. one Colt Model Single Action Army .45 Colt caliber revolver bearing serial number SA98998, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;
- f. one Colt Model Detective Special .38 Special caliber revolver bearing serial number C08216, and any associated ammunition, seized from the Defendant in Arlington, Washington on November 4, 2021;

- 1 g. one Czech Small Arms Model SA VZ61 .32 ACP caliber pistol bearing serial  
2 number 6102772, and any associated ammunition, seized from the Defendant  
3 in Arlington, Washington on November 4, 2021;
- 4 h. one Izhevsk Mechanical Plant Model IZH 35 .22LR caliber pistol bearing  
5 serial number M216600B, and any associated ammunition, seized from the  
6 Defendant in Arlington, Washington on November 4, 2021; and,
- 7 i. one Jimenez Arms Model JA 380 .380ACP pistol bearing serial number 291731, and  
8 any associated ammunition, seized from the Defendant in Arlington, Washington  
9 on November 4, 2021.

10 Upon conviction of the offense alleged in Count 2, JAMES WESLEY BOWDEN  
11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section  
12 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any machineguns and  
13 associated ammunition that were involved in the offense. These include but are not  
14 limited to:

- 15 a. one .308 Winchester caliber machinegun assembled using a receiver from an  
16 Imbel FZ Model FZ DA rifle bearing serial number IB1856, and any  
17 associated ammunition, seized from the Defendant in Arlington, Washington  
18 on November 4, 2021; and,
- 19 b. one .300 Blackout caliber privately manufactured firearm utilizing a  
20 machinegun revolver of unknown origin, and any associated ammunition,  
21 seized from the Defendant in Arlington, Washington on November 4, 2021.

22 Upon conviction of the offense alleged in Count 3, JAMES WESLEY BOWDEN  
23 shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872,  
24 any short barreled rifle and associated ammunition involved in the offense. These include  
25 but are not limited to:

- 26 a. one 9x19 mm caliber privately made rifle with no serial number, and any  
27 associated ammunition, seized from the Defendant in Arlington, Washington  
28 on November 4, 2021.

1       Upon conviction of the offense alleged in Count 4, JAMES WESLEY BOWDEN  
2 shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872,  
3 any destructive devices involved in the offense. These include but are not limited to:

- 4       a. one grenade seized from the Defendant in Arlington, Washington on  
5       November 4, 2021.

6       Upon conviction of the offense alleged in Count 5, JAMES WESLEY BOWDEN  
7 shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872,  
8 any silencers involved in the offense. These include but are not limited to:

- 9       a. two black cylindrical firearms silencers with no identifying markings, seized  
10       from the Defendant in Arlington, Washington on November 4, 2021.

11  
12       **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
13 any act or omission of the defendant,

- 14       a. cannot be located upon the exercise of due diligence;  
15       b. has been transferred or sold to, or deposited with, a third party;  
16       c. has been placed beyond the jurisdiction of the Court;  
17       d. has been substantially diminished in value; or,  
18       e. has been commingled with other property which cannot be divided  
19       without difficulty,

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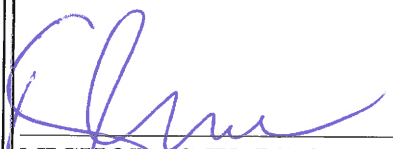
1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to  
3 Title 21, United States Code, Section 853(p).  
4

5 A TRUE BILL:  
6

7 DATED: 15 December 2015  
8

9 *Signature of Foreperson redacted pursuant*  
10 *to the policy of the Judicial Conference of*  
11 *the United States.*

12 \_\_\_\_\_  
13 FOREPERSON  
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16 \_\_\_\_\_  
17 NICHOLAS W. BROWN  
18 United States Attorney  
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20   
21 \_\_\_\_\_  
22 TODD GREENBERG  
23 Assistant United States Attorney  
24

25   
26 \_\_\_\_\_  
27 CECELIA GREGSON  
28 Assistant United States Attorney